

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA  
MODIFIED CHAPTER 13 PLAN  
(POST-CONFIRMATION)**

In Re:  
**MICHAEL TODD REYNOLDS,**  
**4047**  
DEBTOR  
**LINDA MARIE REYNOLDS,**  
**5301**  
CO-DEBTOR

Dated: 6/01/2015

Case No. 12-33964

*In a joint case,  
debtor means debtors in this plan.*

**1. DEBTOR'S PAYMENTS TO TRUSTEE –**

- a. As of the date of this plan, the debtor has paid the trustee 51,000.00.
- b. Starting in June, 2015, the debtors will pay the trustee 800.00 per Month for 26 months for a total of 20,800.00. The minimum plan length is 36 or 60 months from the date of the initial plan payment unless all allowed claims are paid in a shorter time.
- c. The debtor will also pay the trustee: 0.00.
- d. The debtor will pay the trustee a total of 71,800.00 [line 1(a) + line 1(b) + line 1(c)].

**2. PAYMENTS BY TRUSTEE –** The trustee will pay from available funds only creditors for which proofs of claim have been filed. The trustee may collect a fee of up to 10.00% of plan payments, or 7,180.00, [line 1(d) x .10].

**3. ADEQUATE PROTECTION PAYMENTS [§ 1326(a)(1)(C)] –** The trustee will promptly pay from available funds adequate protection payments to creditors holding allowed claims secured by personal property, according to the following schedule, beginning in month one (1).

| <i>Creditor</i> | <i>Monthly Payment</i> | <i>Number of Months</i> | <i>Total Payment</i> |
|-----------------|------------------------|-------------------------|----------------------|
| a. <b>NONE</b>  |                        |                         |                      |

**4. EXECUTORY CONTRACTS AND UNEXPIRED LEASES [§ 365] –** The debtor assumes the following executory contracts or unexpired leases. Cure provisions, if any, are set forth in ¶ 7.

| <i>Creditor</i> | <i>Description of Property</i> |
|-----------------|--------------------------------|
| a. <b>NONE</b>  |                                |

**5. CLAIMS NOT IN DEFAULT –** Payments on the following claims are current and the debtor will pay the payments that come due after the date the petition was filed directly to the creditors. The creditors will retain liens, if any. IN THE EVENT OF THE SURRENDER OR FORECLOSURE OR REPOSSESSION OR RETURN OF THE COLLATERAL TO THE CREDITOR FOR ANY REASON, THE BALANCE OF THE CLAIM, IF ANY, WILL BE PAID AS A GENERAL UNSECURED CLAIM DISCHARGEABLE UPON THE COMPLETION OF THIS CHAPTER 13 PLAN.

| <i>Creditor</i>                   | <i>Description of Claim</i>                            |
|-----------------------------------|--------------------------------------------------------|
| a. <b>JP MORGAN CHASE BANK NA</b> | <b>HOMESTEAD REAL ESTATE – 1<sup>ST</sup> MORTGAGE</b> |
| b. <b>PIONEER BANK</b>            | <b>2000 VOLVO WITH 120,000 MILES</b>                   |
| c. <b>RETAIL SERVICES</b>         | <b>2006 YAMAHA GRIZZLY</b>                             |
| d. <b>STATE FARM BANK</b>         | <b>HOMESTEAD REAL ESTATE – 2<sup>ND</sup> MORTGAGE</b> |
| e. <b>STATE FARM BANK</b>         | <b>2006 FORD F-150 PICKUP TRUCK</b>                    |

**6. HOME MORTGAGES IN DEFAULT [§ 1322(b)(5) and § 1322(e)] –** The trustee will cure defaults on the following claims secured only by a security interest in real property that is the debtor's principal residence. The debtor will pay the payments that come due after the date the petition was filed directly to the creditors. The creditors will retain liens. All following entries are estimates. The trustee will pay the actual amounts of default. IN THE EVENT OF THE SURRENDER OR FORECLOSURE OR REPOSSESSION OR RETURN OF THE COLLATERAL TO THE CREDITOR FOR ANY REASON, THE BALANCE OF THE CLAIM, IF ANY, WILL BE PAID AS A GENERAL UNSECURED CLAIM DISCHARGEABLE UPON THE COMPLETION OF THIS CHAPTER 13 PLAN.

| <i>Creditor</i> | <i>Amount of Default</i> | <i>Monthly Payment</i> | <i>Beg. in Month #</i> | <i>No. of Payments</i> | <i>TOTAL PAYMENTS</i> |
|-----------------|--------------------------|------------------------|------------------------|------------------------|-----------------------|
| a. <b>NONE</b>  |                          |                        |                        |                        |                       |

**7. CLAIMS IN DEFAULT [§ 1322 (b)(3) and (5) and § 1322(e)]** — The trustee will cure defaults on the following claims as set forth below. The debtor will pay the payments that come due after the date the petition was filed directly to the creditors. The creditors will retain liens, if any. All following entries are estimates, except for interest rate.

|    | <i>Creditor</i> | <i>Amount of Default</i> | <i>Int. rate (if applicable)</i> | <i>Monthly Payment</i> | <i>Beg. in Month #</i> | <i>No. of Payments</i> | <i>TOTAL PAYMENTS</i> |
|----|-----------------|--------------------------|----------------------------------|------------------------|------------------------|------------------------|-----------------------|
| a. | NONE            |                          |                                  |                        |                        |                        |                       |

**8. OTHER SECURED CLAIMS; SECURED CLAIM AMOUNT IN PLAN CONTROLS [§ 1325(a)(5)]** — The trustee will pay, on account of the following allowed secured claims, the amount set forth in the "Total Payments" column, below. The creditors will retain liens securing the allowed secured claims until the earlier of the payment of the underlying debt determined under nonbankruptcy law, or the date of the debtor's discharge. NOTWITHSTANDING A CREDITOR'S PROOF OF CLAIM FILED BEFORE OR AFTER CONFIRMATION, THE AMOUNT LISTED IN THIS PARAGRAPH AS A CREDITOR'S SECURED CLAIM BINDS THE CREDITOR PURSUANT TO 11 U.S.C. § 1327, AND CONFIRMATION OF THE PLAN IS A DETERMINATION OF THE CREDITOR'S ALLOWED SECURED CLAIM. IN THE EVENT OF THE SURRENDER OR FORECLOSURE OR REPOSSESSION OR RETURN OF THE COLLATERAL TO THE CREDITOR FOR ANY REASON, THE BALANCE OF THE CLAIM, IF ANY, WILL BE PAID AS A GENERAL UNSECURED CLAIM DISCHARGABLE UPON THE COMPLETION OF THIS CHAPTER 13 PLAN.

| <i>Creditor</i> | <i>Claim Amount</i> | <i>Secured Claim</i> | <i>Int. Rate</i> | <i>Beg. in Month #</i> | <i>Monthly Payment</i> | <i>No. of Payments</i> | <i>Payments on Account of Claim</i> | <i>Adequate Protection from ¶ 3)</i> | <i>TOTAL PAYMENTS</i> |
|-----------------|---------------------|----------------------|------------------|------------------------|------------------------|------------------------|-------------------------------------|--------------------------------------|-----------------------|
| a.              | NONE                |                      |                  |                        |                        |                        |                                     |                                      |                       |

**9. PRIORITY CLAIMS** — The trustee will pay in full all claims entitled to priority under § 507, including the following. The amounts listed are estimates. The trustee will pay the amounts actually allowed.

|    | <i>Creditor</i> | <i>Estimated Claim</i> | <i>Monthly Payment</i> | <i>Beg. in Month #</i> | <i>No. of Payments</i> | <i>TOTAL PAYMENTS</i> |
|----|-----------------|------------------------|------------------------|------------------------|------------------------|-----------------------|
| a. | Attorney's Fees | 2,500.00               | Pro Rata               |                        |                        | 2,500.00              |
| b. | Total           |                        |                        |                        |                        | 2,500.00              |

**10. SEPARATE CLASSES OF UNSECURED CREDITORS** — In addition to the class of unsecured creditors specified in ¶ 11, there shall be separate classes of non-priority unsecured creditors described as follows:

The trustee will pay the allowed claims of the following creditors. All entries below are estimates.

|    | <i>Creditor</i> | <i>(if any)</i> | <i>Amount</i> | <i>Payment</i> | <i>Month #</i> | <i>Payments</i> | <i>PAYMENTS</i> |
|----|-----------------|-----------------|---------------|----------------|----------------|-----------------|-----------------|
| a. | NONE            |                 |               |                |                |                 |                 |

**11. TIMELY FILED UNSECURED CREDITORS** — The trustee will pay holders of nonpriority unsecured claims for which proofs of claim were timely filed the balance of all payments received by the trustee and not paid under ¶ 2, 3, 6, 7, 8, 9 and 10 their pro rata share of approximately 62,120.00 [line 1(d) minus lines 2, 6(d), 7(d), 8(d), 9(f), and 10(c)].

- The debtor estimates that the total unsecured claims held by creditors listed in ¶ 8 are **0.00**.
- The debtor estimates that the debtor's total unsecured claims (excluding those in ¶ 8 and ¶ 10) are **85,203.01**.
- Total estimated unsecured claims are **85,203.01** [line 11(a) + line 11(b)].

**12. TARDILY-FILED UNSECURED CREDITORS** — All money paid by the debtor to the trustee under ¶ 1, but not distributed by the trustee under ¶ 2, 3, 6, 7, 8, 9, 10, or 11 will be paid to holders of nonpriority unsecured claims for which proofs of claim were tardily filed.

**13. OTHER PROVISIONS** —

- The trustee may distribute additional sums not expressly provided for herein at the trustee's discretion.
- The debtors shall submit all future earnings or other income to such supervision or control of the trustee as is necessary for the execution of the Plan. The debtors may retain any tax refunds received during the life of the plan in the amount of 2,000.00. Any tax refund proceeds received in excess of 2,000.00 shall be turned over to the chapter 13 trustee for distribution among the debtors' creditors.

**14. SUMMARY OF PAYMENTS —**

|                                     |                  |
|-------------------------------------|------------------|
| Trustee's Fee [Line 2]              | 7,180.00         |
| Home Mortgage Defaults [Line 6(d)]  | 0.00             |
| Claims in Default [Line 7(d)]       | 0.00             |
| Other Secured Claims [Line 8(d)]    | 0.00             |
| Priority Claims [Line 9(f)]         | 2,500.00         |
| Separate Classes [Line 10(c)]       | 0.00             |
| Unsecured Creditors [Line 11]       | 62,120.00        |
| <b>TOTAL [must equal Line 1(d)]</b> | <b>71,800.00</b> |

**STEPHEN J. BEHM**

Bar no.: 263758  
Address.: BEHM LAW GROUP, LTD.  
403 SOUTH BROAD STREET, SUITE 60  
P.O. BOX 1056  
MANKATO, MN 56002-1056  
Telephone No.: (507) 387-7200

Signed: /s/ MICHAEL TODD REYNOLDS  
MICHAEL TODD REYNOLDS, DEBTOR

Signed: /s/ LINDA MARIE REYNOLDS  
LINDA MARIE REYNOLDS, CO-DEBTOR

(11/14)

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re

Michael Todd Reynolds  
Linda Marie Reynolds

SIGNATURE DECLARATION  
(For use in electronically filed cases only)

Debtor(s).

Case No.

- ☐ PETITION, SCHEDULES & STATEMENTS  
☐ CHAPTER 13 PLAN  
☐ VOLUNTARY CONVERSION, SCHEDULES AND STATEMENTS  
☐ AMENDMENT TO PETITION, SCHEDULES & STATEMENTS  
☒ MODIFIED CHAPTER 13 PLAN  
☐ OTHER (Please describe: \_\_\_\_\_)

I [We], the undersigned debtor(s) or authorized representative of the debtor, make the following declarations under penalty of perjury:

1. The information I have given my attorney and provided in the electronically filed petition, statements, schedules, amendments, and/or chapter 13 plan, as indicated above, is true and correct;
2. The Social Security Number or Tax Identification Number I have given to my attorney for entry into the court's Case Management/Electronic Case Filing (CM/ECF) system as a part of the electronic commencement of the above-referenced case is true and correct;
3. [Individual debtors only] If no Social Security Number was provided as described in paragraph 2 above, it is because I do not have a Social Security Number;
4. I consent to my attorney electronically filing with the United States Bankruptcy Court my petition, statements and schedules, amendments, and/or chapter 13 plan, as indicated above, together with a scanned image of this Signature Declaration;
5. My electronic signature contained on the documents filed with the Bankruptcy Court has the same effect as if it were my original signature on those documents; and
6. [corporate and partnership debtors only] I have been authorized to file this petition on behalf of the debtor.

Date: 6-5-2015

x Michael Todd Reynolds

Signature of Debtor or Authorized Representative

Michael Todd Reynolds  
Printed Name of Debtor or  
Authorized Representative

x Linda Marie Reynolds

Signature of Joint Debtor

Linda Marie Reynolds  
Printed Name of Joint Debtor

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

In Re:

Bky. No. 12-33964

Michael Todd Reynolds and  
Linda Marie Reynolds,

Debtors

Chapter 13 Case

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**UNSWORN CERTIFICATE OF SERVICE**

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I, Stephen J. Behm, attorney with Behm Law Group, Ltd., 403 South Broad Street, Suite 60, P.O. Box 1056, Mankato, MN 56002-1056, declare that on June 5, 2015 I mailed the attached **Notice of Hearing and Motion to Modify Chapter 13 Plan (Post-Confirmation), Memorandum of Law, proposed Order and Modified Chapter 13 Plan (Post-Confirmation), and Amended Schedules I and J** upon all of the entities listed below and on those listed on the attached service list by first class mail postage prepaid to each entity on said list at the addresses stated for each entity, as indicated.

Michael Todd Reynolds, 20696 437<sup>th</sup> Avenue, Delavan, MN 56023.

Linda Marie Reynolds, 20696 437<sup>th</sup> Avenue, Delavan, MN 56023

All creditors listed on the debtor's creditor matrix (See attached list).

Upon each of the entities named below by email via CM/ECF Filing:

Kyle L. Carlson, trustee       --       [info@carlsonch13mn.com](mailto:info@carlsonch13mn.com)  
U.S. Trustee                   --       [ustpreion12.mn.ecf@usdoj.gov](mailto:ustpreion12.mn.ecf@usdoj.gov)

Dated: this 5<sup>th</sup> day of June, 2014.

**BEHM LAW GROUP, LTD.**

/s/ Stephen J. Behm  
Stephen J. Behm, #263758  
403 South Broad Street, Suite 60  
P.O. Box 1056  
Mankato, MN 56002-1056  
Telephone: (507) 387-7200

**12-33964** MICHAEL TODD REYNOLDS and LINDA MARIE REYNOLDS  
**Case type:** bk **Chapter:** 13 **Asset:** Yes **Vol:** v **Chief Judge:** Gregory F Kishel  
**Date filed:** 07/02/2012 **Date of last filing:** 02/28/2014 **Plan confirmed:** 08/24/2012

## Creditors

**Advanta Bank Corporation**

Resurgent Capital Services (60087925)  
PO Box 10368 (cr)  
Greenville, SC 29603-0368

**ADVANTA CREDIT CARDS**

P O BOX 9217 (59951038)  
OLD BETHPAGE NY 11804 (cr)

**ADVANTA CREDIT CARDS**

P O BOX 9217 (59952323)  
OLD BETHPAGE NY 11804 (cr)

**BANK OF AMERICA**

P O BOX 53150 (59951039)  
PHOENIX AZ 85072 3150 (cr)

**BANK OF AMERICA**

P O BOX 53150 (59952324)  
PHOENIX AZ 85072 3150 (cr)

**BANK OF THE WEST**

P O BOX 8160 (59951040)  
WALNUT CREEK CA 94597 (cr)

**BANK OF THE WEST**

P O BOX 8160 (59952325)  
WALNUT CREEK CA 94597 (cr)

**BANK OF THE WEST**

2527 CAMINO RAMON (59959712)  
SAN RAMON CA 94583 (cr)

**Capital One Bank (USA), N.A.**

PO Box 71083 (59989333)  
Charlotte, NC 28272-1083 (cr)

**CAPITAL ONE CARD SERVICES**

P O BOX 30285 (59951041)  
SALT LAKE CITY UT 84130 0285 (cr)

(59952326)  
(cr)

**CAPITAL ONE CARD SERVICES**

P O BOX 30285

SALT LAKE CITY UT 84130 0285

**Discover Bank**

DB Servicing Corporation (59956821)

PO Box 3025 (cr)

New Albany, OH 43054-3025

**DISCOVER CARD**

P O BOX 30943 (59952327)

SALT LAKE CITY UT 84130 (cr)

**DISCOVER CARD**

P O BOX 30943 (59951042)

SALT LAKE CITY UT 84130 (cr)

**DOUGS ANCHOR MARINE INC**

1560 NORTH HIGHWAY 20 (59952328)

WATERTOWN SD 57201 (cr)

**DOUGS ANCHOR MARINE INC**

1560 NORTH HIGHWAY 20 (59951043)

WATERTOWN SD 57201 (cr)

**FORD MOTOR CREDIT**

P O BOX 105704 (59951044)

ATLANTA GA 30348 (cr)

**GANDER MOUNTAIN**

P O BOX 659569 (59951045)

SAN ANTONIO TX 78265 9569 (cr)

**GANDER MOUNTAIN**

P O BOX 659569 (59952329)

SAN ANTONIO TX 78265 9569 (cr)

**GEMB SAMS CLUB**

P O BOX 981084 (59952330)

EL PASO TX 79998 1084 (cr)

**GEMB SAMS CLUB**

P O BOX 981084 (59951046)

EL PASO TX 79998 1084 (cr)

**GURSTEL CHARGO PA**

6681 COUNTRY CLUB DRIVE (59952331)

GOLDEN VALLEY MN 55427 (cr)

**GURSTEL CHARGO PA**

6681 COUNTRY CLUB DRIVE (59951047)

GOLDEN VALLEY MN 55427 (cr)

**JP MORGAN CHAS BANK NA** (59951048)  
1111 POLARIS PARKWAY FLOOR 4J (cr)  
COLUMBUS OH 43240 2050

**JP MORGAN CHASE BANK NA** (59952332)  
1111 POLARIS PARKWAY FLOOR 4J (cr)  
COLUMBUS OH 43240 2050

**MANKATO CLINIC** (59952333)  
P O BOX 8674 (cr)  
MANKATO MN 56002 8674

**MANKATO CLINIC** (59951049)  
P O BOX 8674 (cr)  
MANKATO MN 56002 8674

**PETER ROTH DDS** (59952334)  
121 EAST MAIN STREET (cr)  
SUITE 303  
MANKATO MN 56001

**PETER ROTH DDS** (59951050)  
121 EAST MAIN STREET (cr)  
SUITE 303  
MANKATO MN 56001

**PIONEER BANK** (59952335)  
301 MAIN STREET NE (cr)  
P O BOX 306  
MAPLETON MN 56065

**PIONEER BANK** (59951051)  
301 MAIN STREET NE (cr)  
P O BOX 306  
MAPLETON MN 56065

**Portfolio Recovery Associates, LLC** (60061032)  
c/o U.s. Bank National Association Nd (cr)  
PO Box 12914  
Norfolk VA 23541

**Portfolio Recovery Associates, LLC** (60048792)  
c/o Sam's Club (cr)  
POB 12914  
Norfolk VA 23541

**Quantum3 Group LLC as agent for** (59966122)  
World Financial Network Bank (cr)  
PO Box 788  
Kirkland, WA 98083-0788

(59952336)  
(cr)



**RETAIL SERVICES**

P O BOX 5893  
CAROL STREAM IL 60197 5893

**RETAIL SERVICES**

P O BOX 5893 (59951052)  
CAROL STREAM IL 60197 5893 (cr)

**SAMS CLUB DISCOVER**

2101 SE SIMPLE SAVINGS DRIVE (59952337)  
BENTONVILLE AR 72716 0745 (cr)

**SAMS CLUB DISCOVER**

2101 SE SIMPLE SAVINGS DRIVE (59951053)  
BENTONVILLE AR 72716 0745 (cr)

**SEARS CREDIT CARDS**

P O BOX 6282 (59951054)  
SIOUX FALLS SD 57117 6282 (cr)

**SEARS CREDIT CARDS**

P O BOX 6282 (59952338)  
SIOUX FALLS SD 57117 6282 (cr)

**STATE FARM BANK**

P O BOX 3299 (59952339)  
MILWAUKEE WI 53201 3299 (cr)

**STATE FARM BANK**

P O BOX 3299 (59951055)  
MILWAUKEE WI 53201 3299 (cr)

**State Farm Bank, FSB**

Attn: Bankruptcy Dept. (59962596)  
PO Box 2328 (cr)  
Bloomington, IL 61702-2328

**U S BANK**

P O BOX 790408 (59952340)  
ST LOUIS MO 63179 0408 (cr)

**U S BANK**

P O BOX 790408 (59951056)  
ST LOUIS MO 63179 0408 (cr)

**PACER Service Center****Transaction Receipt**

03/25/2015 20:34:10

|                     |                  |                     |  |
|---------------------|------------------|---------------------|--|
| <b>PACER Login:</b> | eg0150:2543828:0 | <b>Client Code:</b> |  |
| <b>Description:</b> | Creditor List    |                     |  |